

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DANIEL D'AMBLY

Plaintiff,

DECLARATION

v.

CHRISTIAN EXOO a/k/a ANITFASH GORDON; ST.
LAWRENCE UNIVERSITY; TRIBUNE PUBLISHING
COMPANY; NEW YORK DAILY NEWS; VIJAYA
GADDE; TWITTER, INC., COHEN, WEISS AND SIMON,
LLP;

Civil Action No.

2:20-cv-12880-JMV-JAD

Defendants.

WILLIAM L. FOX declares pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the President of defendant St. Lawrence University (the "University").

As such, I am fully familiar with the facts contained herein.

2. I submit this declaration in support of the University's motion to dismiss the Complaint in the above-captioned action pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6).

3. The University is a small, private liberal arts college located in Northern New York state with an enrollment of approximately 2300 undergraduate and 75 graduate students. The University's primary address is 23 Romoda Drive, Canton, New York.

4. The University does not have an office in New Jersey for the transaction of business and does not own, use or possess any real property within the State.

5. The University does not pay taxes to any New Jersey governmental entity and does not have any registered agents or bank accounts in New Jersey.

6. The University does not transact business in New Jersey and is not authorized to do business within the State.

7. The University also does not have any employees in New Jersey.

I declare that the foregoing is true and correct.

Dated: October 21, 2020



William L. Fox